

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF OKLAHOMA**

UNITED STATES OF AMERICA,)	
<i>Plaintiff,</i>)	
)	
v.)	Case No. CR-24-80-RAW
)	
JASON DALE COLE & CRYSTAL FAYE CHESSER,)	
<i>Defendant.</i>)	

UNOPPOSED MOTION TO WITHDRAW AS COUNSEL

COMES NOW, Joseph Barrett, CJA counsel for Defendant Jason Dale Cole (“Defendant Cole”), and respectfully requests the Court to enter an Order granting this Unopposed Motion to Withdraw from representation as requested by Defendant Cole on February 4, 2025. In support, counsel states:

1. In compliance with Local Criminal Rule 12.1(B), the undersigned has conferred with both the United States Attorney’s Office and counsel for co-defendant who do not oppose this Motion - and the EDOK Federal Defender’s Office is aware of this situation.

2. Defendant Cole is named in a multi-count Indictment with Forfeiture Allegation charging Possession with Intent to Distribute Methamphetamine, Possession of a Machine Gun, Felon in Possession of a Firearm, Use and Carry of a Firearm During and in Relation to a Drug Trafficking Crime, Possession with Intent to Distribute Marijuana, Possession of Unregistered Firearm and Maintaining Drug Involved Premises. (Docket# 2).

3. This matter is set for trial on April 1, 2025 with pretrial motions and expert witness notices due on February 24, 2025.

4. Since his appointment as CJA counsel on November 4, 2024, the undersigned has diligently investigated the facts and allegations of this matter in cooperation with Defendant Cole,

co-counsel, the Assistant United States Attorney's Office and upon Defendant Cole's request, several additional sources.

5. On February 3, 2025, Defendant Cole informed that he has no confidence in counsel's representation and expressed his desire to terminate the attorney-client relationship.

6. The undersigned affirms that an irreparable breakdown in the attorney-client relationship has occurred preventing counsel from providing effective representation as required under the Sixth Amendment.

7. This motion is made in good faith and not with any purpose to frustrate justice or cause undue delay.

WHEREFORE, the undersigned respectfully requests the Court enter an Order granting his withdraw as appointed CJA Counsel for Defendant Cole.

Respectfully submitted this 6th day of February 2025.



Joseph P. Barrett (OBA #36350)

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CJA Counsel for Defendant Cole

CERTIFICATE OF MAILING

I hereby certify that on February 6, 2025, I electronically transmitted the foregoing document to the Clerk of the Court using the ECF System for filing and transmittal of a Notice of Electronic Filing

A handwritten signature in blue ink that reads "Joseph P. Barrett".

Joseph P. Barrett